

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BLAKE GEORGE, JOYCE FERFECKI,
MIGUEL ORTIZ, STAURT JOLLY, and
LASZLO VAS, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

JAGUAR LAND ROVER NORTH AMERICA,
LLC,

Defendant.

Case No. 2:20-cv-17561-WJM-**ESK**

**STIPULATION AND CONSENT ORDER EXTENDING
THE DEADLINE FOR DEFENDANT TO FILE
A MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

This matter having come before the Court by Defendant Jaguar Land Rover North America, LLC by and through its counsel, Hogan Lovells US LLP, and by Plaintiffs Blake George, Joyce Ferfecki, Miguel Ortiz, Stuart Jolly, and Laszlo Vas by and through their counsel, Bursor & Fisher, P.A., and Milberg Coleman Bryson Phillips Grossman, PLLC, and the parties having stipulated and agreed to the following, subject to Court approval:

WHEREAS, on November 8, 2021, this Court (1) granted in part and denied in part Defendant's motion to dismiss the First Amended Complaint and (2) granted Plaintiffs leave to amend as to the claims dismissed without prejudice within twenty (20) days, *see* Dkt. No. 24 at 17;

WHEREAS, Plaintiffs filed the Second Amended Complaint on November 29, 2021, *see* Dkt. No. 29;

WHEREAS, on November 24, 2021 (before the Second Amended Complaint had been filed), this Court extended the deadline for Defendant to file an answer until at least thirty (30) days after Plaintiffs amended the First Amended Complaint—*i.e.*, until at least December 29, 2021, *see* Dkt. No. 28;

WHEREAS, now that the Second Amended Complaint has been filed and Defendant has reviewed it, Defendant has decided to file a motion to dismiss the Second Amended Complaint;

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), the current deadline for Defendant to file a response (other than an answer) to the Second Amended Complaint is December 13, 2021;

WHEREAS, on November 12, 2021, this Court also entered a Letter Order that scheduled a December 21, 2021 conference with the parties and established certain requirements for the parties to perform in preparation for that conference, *see* Dkt. No. 26;

WHEREAS, Defendant respectfully requests a thirty (30) day extension of the December 13, 2021 deadline to allow sufficient time (1) for Defendant to focus on working with Plaintiffs to comply with the requirements of this Court's November 12, 2021 Letter Order and (2) to respond to Plaintiffs' new allegations in this complex, putative class action;

WHEREAS, Plaintiffs consent to Defendant's request; and good cause having been shown:

IT IS, on this **13th** day of **December** 2021, **ORDERED** that:

Defendant shall file any motion to dismiss the Second Amended Complaint on or before January 12, 2022.

Dated: December 10, 2021

By: /s/Frederick J. Klorczyk III
Frederick J. Klorczyk III
BURSOR & FISHER, P.A.

By: /s/Jessica K. Jacobs
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*Attorneys for Defendant Jaguar Land Rover
North America, LLC*

SO ORDERED:

/s/ Edward S. Kiel

The Hon. Edward S. Kiel, U.S.M.J.